

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

O.R., by and through his parents, Cheryl Rogers and Greg Rogers, on behalf of himself and those similarly situated;

CHERYL ROGERS;

GREG ROGERS;

E.G., by and through her mother, Amber Galea, on behalf of herself and those similarly situated;

M.G., by and through her mother, Amber Galea; and

W.M., by and through his mother, Kersey Clark,

*Plaintiffs,*

v.

C/A No. 6:25-cv-02599-DCC

GREENVILLE COUNTY, SOUTH CAROLINA;

GREENVILLE COUNTY LIBRARY SYSTEM;

BEVERLY JAMES, in her official capacity as Executive Director of the Greenville County Library System; and

KAREN ALLEN, in her official capacity as Youth Services Manager of the Greenville County Library System,

*Defendants.*

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendants Greenville County Library System, Beverly James, in her official capacity as Executive Director of the Greenville County Library System, and Karen Allen, in her official capacity as Youth Services Manager of the Greenville County Library System (collectively the “Library Defendants”) respectfully move for a seven-day extension of time to Reply to Plaintiffs’ Response in Opposition to Defendants’ Motion to Dismiss (ECF No. 27). This motion is made pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civil Rule 6.01. The Library Defendants’ Reply is currently due on **August 8, 2025**. With the extension, the Reply would be due on **August 15, 2025**.

This extension is requested because the Library Defendants' counsel's other litigation deadlines and court appearances have hindered their ability to prepare a Reply to Plaintiffs' Response. These obligations include filings due this week in *Turner v. State* (No. 2022-001287) (S.C. Ct. App.) and *Doe v. South Carolina* (No. 25-1787) (4th Cir.), and the preparation of an expedited filing due early next week in support of a preliminary injunction in *Lopez v. United States*, 2:25-cv-02758-DWL and other demands and appearances in that case, which was recently transferred from the United States District Court for the District of Columbia to the United States District Court for the District of Arizona.

The briefing deadline in question has been previously extended once by this Court for a period of seven days. (*See* ECF No. 29.) Granting this motion would not affect any other deadlines applicable to this case, nor would it prejudice any party.

The Library Defendants' counsel conferred with Plaintiffs' counsel before filing this Motion. Plaintiffs do not object to this request for an extension of time.

For the reasons stated above, the Library Defendants ask that the Court approve their Motion for Extension of Time.

[signature page to follow]

Respectfully submitted,

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*Attorneys for Greenville County Library System; Beverly James, in her official capacity as Executive Director of the Greenville County Library System; and Karen Allen, in her official capacity as Youth Services Manager of the Greenville County Library System*

Greenville, South Carolina  
August 7, 2025